

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Ari Baruch Teman, Plaintiff,

v.

Zeldes Needle Cooper LLP, Jeremy Virgil, et al., Defendants.

Civil Action No. 1:24-cv-09830-LJL

**AFFIDAVIT OF ARI BARUCH TEMAN IN SUPPORT OF OPPOSITION TO DEFENDANTS’  
MOTION TO DISMISS**

I, Ari Baruch Teman, declare under penalty of perjury:

- I am the pro se Plaintiff in this action and submit this affidavit to oppose Defendants’ Motion to Dismiss (ECF No. [TBD], filed May 1, 2025).
- The allegations in the Complaint (ECF No. 1) are true to the best of my knowledge. Defendants Zeldes Needle Cooper LLP (ZNC), Jeremy Virgil, Maximino Medina, and other named Defendants defaulted my \$75 million medical malpractice case (INDEX 805410/2014), made multiple misrepresentations about its handling and appealability, and conspired to sabotage it through deliberate neglect and conflicts of interest with Silver Hill Hospital’s parent organization and PATH Medical (Compl. ¶¶ 1–22).
- On dates listed in exhibits in the complaint (including Apr 23, 2021; Nov 9, 2022 , etc), and in and around that time, I sent emails, made phone calls, and communicated in person with Virgil, Medina, and other named Defendants, urgently warning them of docket lapses, such as missed filings and court orders, which they consistently ignored (e.g., “[Date]: Email to Virgil, ‘Filings missed, please act,’ no reply”; “[Date]: Mass email to every ZNC attorney, ‘Court orders ignored, urgent,’ no response”).

- On and around Wed, Nov 9, 2022, 4:42 PM Virgil falsely assured me that the case was under control and that the default was appealable, and later suggested pursuing the case to the United States Supreme Court, despite knowing these statements were untrue, causing me to rely on their misrepresentations to my detriment.
- Defendants' assertion in their Motion to Dismiss that Dr. Vastal G. Thakkar is my damages expert and that his 2014 letter was retracted (Yannucci Dec., p. 8) is a deliberate falsehood. Thakkar is not my damages expert and never was, and his letter was *not* retracted. I provided Cristina Yannucci with the true expert statement from Jay Weintraub of Connectiv, confirming the \$75 million valuation of my case, on [date] (Ex. A, redacted).
- ZNC was also aware of at least two additional medical experts, Dr. Alyssa Kriegel and Dr. Eril Shvil, who treated me and were prepared to testify to PATH/Dr. Eric Braverman's malpractice, who had already provided affidavits that ZNC has in their possession, further demonstrating Defendants' bad faith.
- Defendants' footnote 1 (p. 10) maliciously misrepresents my litigation history by listing prior cases to suggest I am vexatious, while omitting my significant successes:

a. *Teman v. City of Miami Beach* (1:2023-cv-21361, S.D. Fla.): I secured the immediate release of body camera footage showing I was the victim of an unprovoked assault (I literally did not know the assailant existed until he ran full speed into my head and neck because, he explained on body-worn camera (BWC) he was upset I was taking photos of runners endangering elderly cafe patrons) and the police coached their friend to lie to protect the assailant while making strange comments about the Jews, and the judicial assignment of counsel, advancing public accountability.

b. *Teman v. Perry* (1:19-cv-20143-FAM, S.D. Fla.): I achieved Judge Perry's recusal and the dismissal of a baseless case alleging I controlled a website that the plaintiff conceded was not registered to me and bore the exact language used by another patient of Buch.

c. *United States v. Teman* (1:19-cr-00696, S.D.N.Y.): This case is currently on appeal and under 28 U.S.C. § 2255 review, with Harvard Law Professors Alan Dershowitz and Lawrence Lessig, Ronald Coleman, DOJ Civil Rights Head Harmeet Dhillon, Acting U.S. Attorney Ed Martin, and many other experts and community leaders publicly declaring my innocence and urging a pardon, all pro bono with no prior relationships to me (Exs. B–F).

Yannucci shows her character and her clients’ by taking these cheap shots, which she does because she has no case and her unethical clients blew a case through ego and incompetence and now lie to this Court in the hope a pro se applicant will be unable to fight back.

This Court should sanction Yannucci and her clients substantially for the outright lies and misrepresentations—none of which have anything to do with ZNC and its lawyers willfully ignoring emails from their client, opposing counsel, and the New York State Court.

- ZNC accepted me as a client in part due to my excellent reputation and profound history of successful innovation and entrepreneurship: I am the founder of JCorps, an award-winning transformative volunteer organization which I grew to operate in seven cities across the USA, Israel, and Canada (currently still an independent nation) and was named the Jewish Federation of North America’s “Hero of the Year” for mobilizing thousands of young adults to volunteer—often for the first time in their lives.
- I was also honored as an official guest of the White House and Mayor Michael Bloomberg and founded 12gurusHealth, 12gurusCharity conferences, and TouchlessLabs LLC to advance healthcare, nonprofit work, and health technology, all wholly owned enterprises. Defendants deliberately targeted and defamed my volunteer network and good deeds through their sabotage, knowing a jury would recognize the profound harm inflicted (Compl. ¶¶ 5–6, 21).
- Defendants’ falsehoods, including the lie about Weintraub as damages expert, the Thakkar lie, the omission of Kriegel and Shvil’s statements, and the footnote smear, have wasted Court resources and

forced me to expend a weekend and two days of significant effort rebutting their misrepresentations, mirroring the fraudulent conduct alleged in the Complaint.

- Dr. Eric Braverman's two criminal convictions and the shutdown of his practice following a New York Attorney General investigation after more than 20 patients filed complaints (Ex. G) ensure that multiple medical experts, including Kriegel and Shvil in addition to Thakkar, whose affidavits are already in possession of ZNC, are available to testify to his malpractice, confirming the merit of my underlying case.
- ZNC explicitly recommended bifurcating the case to target PATH Medical's insurance coverage and the insurance of the individual practitioners, believed to be \$5 million per practitioner, with over five practitioners and the practice itself named as defendants, ensuring collectible damages exceeding \$25 million. This was particularly viable given evidence that PATH's insurer knew of Braverman's harmful practices and failed to act, increasing their liability (Compl. ¶¶ 4, 15).
- As a direct result of Defendants' misconduct, I suffered a \$75 million financial loss, severe exacerbation of my PTSD, and irreparable harm to my volunteer network and business enterprises, including JCorps, 12gurusHealth, 12gurusCharity, and TouchlessLabs LLC, which depended on my leadership and reputation. Medical malpractice suits are intended to restore resources and abilities to the injured and provide supplemental help, but all of this was lost due to ZNC, Virgil, Medina, and all named Defendants' lies and negligence.
- ZNC and Virgil never communicated that the underlying case was unwinnable. To the contrary, Virgil suggested in emails that they would pursue the case to the United States Supreme Court, a representation I now believe was a deliberate falsehood to mislead me and exhaust the statute of limitations. Prior to that, Virgil and ZNC explicitly said they would be going after the insurance policies of the practitioners and PATH because they knew the case had merit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 5, 2025

/s/ Ari Teman/

Ari Baruch Teman

**Exhibits:**

A: Email with Weintraub Statement to Yannucci

B–F: Letters from Lessig, Coleman (on Dhillon Law letterhead), Dershowitz, X posts from Martin

G: Braverman Investigation Records (“Quackwatch” Overview)

H: NYPost article detailing ZNC / Teman’s \$24 Million suit v Braverman/PATH